



# United States Department of the Interior

BUREAU OF INDIAN AFFAIRS

PHOENIX AREA OFFICE

P.O. BOX 10

PHOENIX, ARIZONA 85001

IN REPLY  
REFER TO:

Environmental Quality Services

(602) 379-6750

File 4304.2 Roads Shop Facility Administrative Order

JUL 19 1995

Ms. Loretta K. Barsamian  
Chief, Drinking Water Protection Branch  
U.S. Environmental Protection Agency  
Region IX  
75 Hawthorne Street  
San Francisco, California 94105-3901

Re: Administrative Order (Order) Regarding Past and Present  
Contaminant Activities at the Bureau of Indian Affairs (BIA)  
Eastern Nevada Agency Roads Shop Facility (Facility) Located  
in Owyhee, Nevada, Docket No. UIC-EO-95-001

Dear Ms. Barsamian:

As you know, the Order issued to the BIA requires our agency under Paragraph 18 to complete a Work Plan which addresses the requirements described in Paragraphs 21 through 33. These paragraphs address source characterization and system closure of the Facility drain and former well, and heating oil line. Enclosed please find a portion of the Work Plan which describes the work associated with Paragraphs 21 through 33.

The enclosed Work Plan generally describes the Facility drain, former well, and heating oil line, and discusses our planned approach to the work. The plan currently does not include field sampling and laboratory analytical methods or associated quality assurance requirements. The plan will also require further revision and clarification prior to its approval by a registered geologist.

As stated in our June 21, 1995 letter to you, we plan to address in one Work Plan, as feasible, provisions of Paragraphs 21 through 45 of the Order and provisions for the assessment of three former underground storage tank (UST) sites located in the area. We plan to complete this document within 60 days of the effective date of the Order.

After review of the Order, it was determined that Contractor assistance in the area of geology and hydrogeology, well construction, and quality assurance was advisable. In addition, we believe a third party should review our work and provide comments, and review comments provided to us. We are currently in the process

of procuring this Contractor through a BIA interagency agreement or purchase order.

In addition, BIA Phoenix Area Office (PAO) and Eastern Nevada Agency staff reviewed the Facility and former UST locations in Owyhee, Nevada on July 11 and 12, 1995. Their intent was to identify stained soils, locate former and existing material storage facilities, and measure and locate features necessary for the completion of the Work Plan.

Through this site visit and further review of the Order, we bring the following issues to your attention:

1. Paragraphs 22 and 23: The materials in the floor drain sump have only been partially removed. Approximately 765 gallons of waste water is present in the floor drain sump.

2. Paragraph 26: We believe that grouting the excavation associated with the former well will not provide any benefit as this location is not in a natural drainage area and will no longer be connected to the drain system.

3. Paragraphs 28 through 31: We plan to remove the Facility heating oil line and assess the subsurface. In 1985, the use of the underground system associated with the 16,000-gallon heating oil tank was permanently stopped. However, the tank is still in use as a storage tank to supply heating oil to the community. Heating oil is transported by vehicle to heating oil tanks in the community.

4. Paragraph 32: We concur with the sampling of Well #3 (10 hp), but believe any further sampling or use of Wells #1 (30 hp) and #2 (7.5 hp) not advisable at this time. Characterization of the plume(s) in the aquifer will occur using a consistent methodology as required in Paragraph 39.

5. Paragraph 33: We have similar concerns regarding the quality of the aquifer between Wells #1 and #2, and Well #3, and concur with the establishment of a monitoring well in the area; however, we believe subsurface characterization as required in Paragraph 39 should occur first.

6. Paragraphs 35 and 36: On Page 27 of the report entitled: "Study of the Water and Sewerage Systems" written by the BIA and dated July 1, 1974, a discussion regarding Wells #2 (Well No. 1 in this excerpt) and #3 (Well No. 2 in this excerpt) was provided as follows:

"Water Supply: The present water supply at Owyhee is obtained from two wells, both between 75 and 80 feet deep. No well logs nor production data could be found but it is known that they were drilled into the alluvium of the river valley and that Well No. 2 (drilled in 1960) is gravel packed. It is also the stronger well. The pumps

currently installed are 7.5 hp submersibles, each currently pumping approximately 70 gpm against a pressure of about 80 psi (as checked using the meters on the discharge lines). Well No. 1 serves mostly in a standby capacity, augmenting the production of Well No. 2. The reason is primarily because Well No. 2 has automatic controls while those on Well No. 1 are manual."

In short, information regarding Wells #2 and #3 will be limited. Regarding Well #1, we have been able to obtain a State of Nevada, Division of Water Resources, Well Drillers Report.

7. Paragraphs 37 and 38: We will not be able to provide this information until site characterization activities, as described in the Work Plan, are performed.

I certify under penalty of law that this letter and enclosure was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the persons directly responsible for gathering the information, I certify that the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any comments, questions, concerns, or require further information, please contact Mr. John Krause, PAO Hazardous Waste Coordinator at (602) 379-6750.

Sincerely,

  
Acting Area Director

Enclosure